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**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

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UNITED STATES OF AMERICA	:	
	:	
V.	:	18-CR-97
	:	
ROSS ROGGIO	:	
ROGGIO CONSULTING, LLC	:	

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**DEFENDANT’S MOTION TO DISMISS COUNTS I AND II OF THE  
SUPERSEDING INDICTMENT**

AND NOW, this 14<sup>th</sup> day of October, 2022, Defendant hereby moves this Court to dismiss Counts I and II of the Superseding Indictment. Synonymously with this Motion, Defendant is filing a Brief in Support thereof containing the reasons for this request. That Brief is incorporated by reference as if set forth in full herein.

Respectfully Submitted

*Comerford Law*

*Matthew Comerford*

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Matthew T. Comerford, Esq.

*Curt Parkins*

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Curt M. Parkins, Esq.

*Shrive Law*

*Jason Shrive*

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Jason A. Shrive, Esq.

Attorneys for Defendant

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**CERTIFICATE OF SERVICE**

AND NOW, this 14<sup>th</sup> day of October, 2022, I, Curt M. Parkins, Esq., hereby certify that I served a copy of the foregoing Motion and its supporting Brief upon AUSA Hinkly via ECF.

*Curt Parkins*

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Curt M. Parkins, Esq.

**CERTIFICATE OF NON-CONCURRENCE**

AND NOW, this 14<sup>th</sup> day of October, 2022, I, Curt M. Parkins, Esq., hereby certify that I reached out to AUSA Hinkley for concurrence but have not yet received a response.

*Curt Parkins*

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Curt M. Parkins, Esq.

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**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_ 2022, it is hereby ordered that Defendant's Motion to Dismiss is granted. Counts I and II of the Superseding Indictment are hereby dismissed.

\_\_\_\_\_  
Mariani, J.